

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF WEST VIRGINIA

FILED

JUN 22 2022

U.S. DISTRICT COURT-WVND
WHEELING, WV 26003

UNITED STATES OF AMERICA,

v.

CAROLYN TAYLOR,

Defendant.

Criminal No.

5:22 cr 19

Violation:

18 U.S.C. § 1623

INFORMATION

The United States Attorney charges that:

COUNT ONE

(Perjury)

1. At all relevant times, the Pleasants County Prosecuting Attorney's Office, the Pleasants County Sheriff's Office, and the St. Marys Police Department operated a program called Slow Down for the Holidays ("SDFH") with the approval of the City of St. Marys.

2. At all relevant times, pursuant to the SDFH program, a law enforcement officer who stopped an individual for a traffic violation in the City of St. Marys or in Pleasants County would offer the individual the option to donate toys, goods, or gift cards with a certain value to a local charity in lieu of a fine.

3. At all relevant times, pursuant to the SDFH program, the individual would deliver the donation, including gift cards, to the City of St. Marys Police Clerk.

4. For the period of approximately 2015 to April 2021, the defendant **CAROLYN TAYLOR**, served as City of St. Marys Police Clerk.

5. In this position, the defendant was responsible for collecting and storing the gift cards provided to the City of St. Marys pursuant to the SDFH program.

6. On or about December 16, 2020, an individual whom the Pleasants County Sheriff's Office had cited for Driving While License Revoked for Driving under the Influence, in violation of West Virginia Code, Section 17B-4-3(b), delivered four gift cards with a total value of \$2,000 to the defendant in her capacity as City of St. Marys Police Clerk and pursuant to the SDFH program.

7. From on or about January 28, 2021, to on or about February 5, 2021, the defendant used one of the four gift cards referenced above to conduct transactions for her own personal benefit without the knowledge or authority of the City of St. Marys.

8. On or about February 1, 2022, in Ohio County, West Virginia, in the Northern District of West Virginia, the defendant, while under oath and testifying in a proceeding before a grand jury of the United States in the Northern District of West Virginia, did knowingly make a false material declaration.

9. On or about the aforesaid date, the grand jury was investigating to determine whether violations of Title 18, United States Code, Section 1343 had been committed, and to identify the persons who had committed, caused the commission of, and conspired to commit such violations.

10. It was material to said investigation that the grand jury ascertain if anyone had converted any of the SDFH gift cards to personal use.

11. At the time and place alleged, the defendant was a witness under oath at a proceeding before a grand jury and knowingly made the following declarations in response to the following questions with respect to the material matter alleged above as follows:

- a. Question: "Are you aware of any of the donations being used for any reason outside of charity?"

Answer: "No."

- b. Question: "Are you aware of anyone using the donations to buy anything for their own personal benefit?"

Answer: "No."

- c. Question: "Do you have any knowledge or reason to believe that anyone used these gift cards or cash for personal benefit?"

Answer: "No."

- d. Question: "Do you understand that a primary inquiry of this investigation is to determine whether anyone used these, quote, unquote, donations for personal benefit? You understand that's part of the inquiry?"

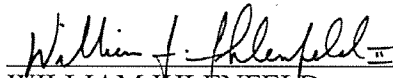
Answer: "Yes."

Question: "Do you have any evidence to tell the Grand Jury today that would be relevant to that investigation?"

Answer: "No."

12. The aforesaid underscored testimony of the defendant, as she then and there well knew and believed was false in that, she had used a SDFH gift card for her personal benefit.

In violation of Title 18, United States Code, Section 1623.



WILLIAM IHLENFELD
United States Attorney

Jarod J. Douglas
Assistant United States Attorney